



2970 Myers Street  
Riverside, CA. 92503

June 15, 2004

EA04-009

Kathleen C. DeMeter, Director  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street S.W.  
Washington, DC 20590

Dear Ms. DeMeter,

This letter is in response to a NHTSA memorandum dated April 23, 2004 titled "2002-2004 Fleetwood Towable Recreational Vehicles' (RV's) Wheel Mounting System Clamp Performance". Fleetwood Enterprises, Inc. received a faxed copy of this memorandum (available on the NHTSA website) from a third party on June 3, 2004. A statement in the referenced memorandum notes that Fleetwood had not been aggressive in obtaining evidence or in dedicating engineering effort to investigate this issue. We believe this statement is a patently inaccurate representation of Fleetwood's management of a potential safety defect investigation and the specific actions taken by Fleetwood to promptly address a safety issue.

Engineering data gathering conducted by Fleetwood and the related analysis of aluminum wheel separation dates back to 2002, prior to the Office of Defect Investigation's involvement. Fleetwood resources were commissioned to this investigation and the following actions were among those taken:

- Fleetwood project assignment by Larry Budica - Engineering Manager, to Jim Bertoch, Lead Engineer, which resulted in engineering tests and data gathering as early as April 2002
- Fleetwood Service Department successful attempts to retrieve incident parts
- Fleetwood's contacting the appropriate technical representatives of the wheel and axle component suppliers and requesting their assessments
- Fleetwood's reviewing the wheel assembly process methods at Fleetwood's travel trailer manufacturing facilities
- Fleetwood's retaining of an outside engineer consultant

Throughout Fleetwood's extensive testing and analysis, review of supplier test results and technical assessments, and the consultation by an engineering consultant, Fleetwood has not identified a specific design defect with the wheel system or axle assembly that would generate a wheel separation incident when the system is properly torqued and subjected to Fleetwood's recommended wheel torque maintenance practices. Our findings have lead us to the opinion that excessive paint coating on the axle mating surfaces was a significant contributor to initial torque

relaxation which can be overcome by Fleetwood's maintenance schedule within the initial 50 miles of operation.

Fleetwood appreciates the assistance of the Office of Defect Investigation and we are committed to aggressively monitoring customer experiences and addressing any new information identified during the O.D.I. Engineering Analysis (EA). At your convenience, we would welcome the opportunity to discuss with you personally our extensive efforts to resolve all the issues related to this matter.

Respectfully,



David C. Warren

Vice President - Engineering, RV Group  
Fleetwood Enterprises, Inc.

cc: Chris Braun - Fleetwood Enterprises, Inc.  
Forrest Theobald - Fleetwood Enterprises, Inc.  
Tom Bowman - National Highway Traffic Safety Administration  
Richard Boyd - National Highway Traffic Safety Administration